

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
FT. MYERS DIVISION**

In re

Douglas Dixon and JoAnn Collison

CHAPTER 13
CASE NO. 9:17-bk-07370-FMD

Debtor(s)

**OBJECTION BY FORETHOUGHT LIFE INSURANCE COMPANY
TO CONFIRMATION OF CHAPTER 13 PLAN FILED BY THE DEBTOR(S)**

FORETHOUGHT LIFE INSURANCE COMPANY("Creditor"), by the undersigned attorneys, objects to confirmation of the Plan ("Plan") as proposed by the Debtor(s) and any future Plan(s) filed by the Debtor(s) to the extent that such Plan or Plans contain the provision(s) to which this Objection is directed. In support of this Objection, the Creditor states as follows:

1. For value received, the Debtor(s) executed and delivered an installment sales contract ("Contract") as evidence of indebtedness to Creditor. Said indebtedness is secured by property more particularly described in the Contract as: REAL PROPERTY LOCATED: 28750 DIAMOND DR BONITA SPRINGS , FL 34134, LEGALLY DESCRIBED AS: UNIT 101, BUILDING 2, PHASE 2, BERMUDA RIDGE, A CONDOMINIUM ACCORDING TO THE DECLARATION OF CONDOMINIUM RECORDED IN OFFICIAL RECORD BOOK 2921, AT PAGE(S) 3739-3815, ET. SEQ., OF THE PUBLIC RECORDS OF LEE COUNTY, FLORIDA, TOGETHER WITH ALL APPURTENANCES THEREUNTO APPERTAINING AND SPECIFIED IN SAID CONDOMINIUM DECLARATIO AND AS MAY BE AMENDED ("Collateral"). Reasons for objection: See below

Failure to Provide for Treatment of Secured Claim in Plan

2. The Plan fails to provide for payment of the claim or any treatment of the Creditor's secured claim in regards to this loan account.

3. The Chapter 13 Plan fails to comply with 11 U.S.C. 1325(a)(1) in that it does not provide adequate protection for Creditor's interest pursuant to 11 U.S.C. 361. In addition, Creditor does not agree to such treatment though the Plan.

4. Creditor will withdraw this Objection in the event that the Plan is amended to conform to the Creditor's proof of claim or otherwise satisfactorily address the issue(s) raised in this Objection.

WHEREFORE, Creditor prays for the entry of an appropriate order denying confirmation

with respect to the Plan as proposed and any future Plan(s) filed by the Debtor(s) to the extent that such Plan or Plans contain the provisions to which this Objection is directed.

/s/ Nicole Mariani Noel
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT a true and correct copy of the foregoing was furnished on November 29, 2017, by U.S. Mail and/or electronic mail via CM/ECF pursuant to Local Rule 1001-2 to: Douglas Dixon and JoAnn Collison , 5811 Shady Oaks Lane , Naples, FL 34119; Melissa H Jeda 5278 Golden Gate Pkwy, Naples, FL 34116; Jon Waage, Trustee P.O. Box 25001, Bradenton, FL 34206-5001.

/s/ Nicole Mariani Noel
Nicole Mariani Noel (x1343)

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